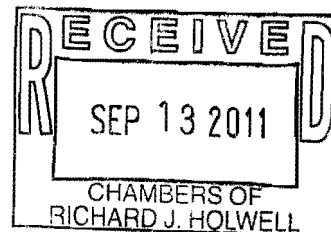


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK



-----X
DEUTSCHE BANK TRUST COMPANY,
AMERICAS, in its capacity as successor indenture
trustee for certain series of Senior Notes, LAW
DEBENTURE TRUST COMPANY OF NEW
YORK, in its capacity as successor indenture
trustee for certain series of Senior Notes, and
WILMINGTON TRUST COMPANY, in its
capacity as successor indenture trustee for certain
series of PHONES Notes

Plaintiffs,

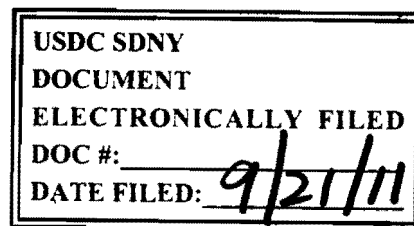
vs.

ADALY OPPORTUNITY FUND TD
SECURITIES INC. C/O ADALY INVESTMENT
MANAGEMENT CO., *et al.*

Defendants.
-----X

Docket No. 11-cv-04784

STIPULATION



IT IS HEREBY STIPULATED AND AGREED by and among the undersigned that:

1. Defendant Robert E. La Blanc shall have up to and including October 20, 2011 to answer, move or otherwise respond to the amended complaint herein, subject to any stay of proceedings which may then be in effect;
2. Said defendant waives any defenses relating to service of process, but otherwise reserves any and all available defenses; and
3. Electronically transmitted or facsimile signatures on this stipulation shall be deemed as originals for all purposes.

Dated: September 12, 2011

AKIN GUMP STRAUSS HAUER & FELD
LLP

By: 

James P. Chou
Christine D. Doniak
One Bryant Park
New York, New York 10036
(212) 872-1000

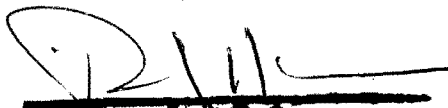
Counsel for Plaintiffs

By: 

David R. Lurie
10 East 40th Street, Suite 3307
New York, New York 10016
(347) 651-0194

Counsel for Defendant Robert E. La Blanc

SO ORDERED:


U.S.D.J.
9/17/11 